

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. 21-CR-40052-JPG
	)	
DENNIS A. WARD,	)	
	)	
Defendant.	)	

**STIPULATION OF FACTS**

Comes now the United States of America, by and through its attorneys, Rachelle Aud Crowe, United States Attorney for the Southern District of Illinois, and George A. Norwood, Assistant United States Attorney, together with the defendant, DENNIS A. WARD, and his counsel of record, Shanna Surratt, and herewith enter into the following stipulation of facts consistent with Section 1B1.3 of the United States Sentencing Guidelines pertaining to the defendant's relevant conduct.

**Count 1**

From on or about December 2020, until on or about June 2021, in Jackson, Williamson, and Alexander Counties, within the Southern District of Illinois, the Defendant and others agreed to commit a crime - the distribution of methamphetamine.

During the course of the conspiracy, the Defendant was obtaining dealer amounts of methamphetamine from co-conspirator J.V. and then redistributing the methamphetamine. Court-authorized wiretaps showed the Defendant obtaining methamphetamine from J.V. on a "front" (J.V. would give some or all of the drugs to the Defendant on credit, the Defendant would sell the drugs, and then the defendant would pay J.V. after the drugs had been sold). The

Defendant would sometimes advise J.V. that the Defendant already had a customer waiting to purchase the methamphetamine. The Defendant and J.V. both knew that the Defendant was obtaining the methamphetamine from J.V. for the purpose of the Defendant redistributing the methamphetamine to the Defendant's customers.

Records from a court-authorized wiretap of J.V.'s telephone show that the defendant and J.V. had contact 145 times (32 audio calls and 113 text messages) between April 9, 2021, and May 12, 2021. In those phone calls, there is clear communication about drugs being fronted by J.V. to the defendant. The phone calls also show the defendant offered to launder money for J.V. through real estate transactions that the defendant attempted to organize. The defendant and J.V. discussed money laundering J.V.'s drug proceeds on multiple occasions in order for J.V. to have "clean" money which could be easily spent.

### **Count 3**

On May 11, 2021, in Marion, Illinois, within Williamson County, Illinois, law enforcement officers stopped a vehicle in which the defendant was a passenger. Law enforcement officers searched the vehicle and located a digital scale and a small black safe which was located on the floorboard where the defendant has been sitting. The safe was opened and contained approximately 129 grams of methamphetamine. The Defendant knowingly and intentionally possessed the methamphetamine. The Defendant knew that the substance was a controlled substance. The Defendant intended on distributing the methamphetamine to other individuals. A DEA laboratory forensic chemist would testify that the amount involved was 129.1 grams of Methamphetamine Hydrochloride with a purity of 100%.

Williamson, Jackson, and Alexander Counties are within the Southern District of Illinois.

This stipulation of facts is intended only to provide the Court with a sufficient foundation to accept the Defendant's guilty plea and is not an exhaustive account of the Defendant's involvement in this criminal activity.



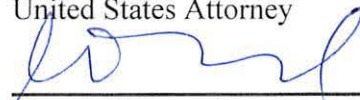
DENNIS A. WARD  
Defendant



Shanna Surratt  
Attorney for Defendant

Date: 11/15/23

RACHELLE AUD CROWE  
United States Attorney



George Norwood  
Assistant United States Attorney

Date: 11/15/23